

November 2, 2004

Docket No. 04-AAER-1

TO: Public Advisor
Copy: R. Michael Martin, California Energy Commission

COMMENT ON AGENDA ITEM #5. APPLIANCE EFFICIENCY RULEMAKING.

AMENDMENTS TO APPLIANCE EFFICIENCY REGULATIONS
CALIFORNIA CODE OF REGULATIONS, TITLE 20, SECTIONS 1601 – 1608

The proposed standard that appears in Table A-6A-7 1605.3 for Refrigerated Canned and Bottled Beverage Vending Machines (0.005C + 4.76) is not appropriate for all types of refrigerated beverage vending machines. It is only appropriate for single package (bottled or canned) vendors, from which it was developed. This energy amount is not appropriate for “Multi-Package” Beverage Vending Machines, which can vend a huge variety of package shapes and sizes at various price points from the same machine. Multi-Package Vending Machines have only been in the marketplace for a very short time. Glass Front Multi-Package Vending Machines are being placed in canteens, break rooms, and public places throughout California.

Multi-Package Vendors play a significant role in Coca-Cola’s future. They are being placed in greater numbers. Beverage Vending Machines serve the same purpose as supermarkets or convenience stores; they are accounts where consumers can purchase refreshing, thirst-quenching drinks. To Coca-Cola, the vending machine is a retail store. Consumers want the same beverage variety from all retail outlets. For a long time consumers have told Coca-Cola that they want the same product variety from vending machines that they have from supermarkets. They want more than a single-volume package from a vendor. They want to be able to purchase small drinks and large drinks from the same machine. But the traditional can/bottle vendor cannot meet that demand. The new Multi-Package Vending Machine gives consumers what they say they want. The new machines can vend over forty different products of varying package types – juice boxes, tetra packs, aseptic cartons, glass bottles, as well as metal cans and plastic bottles. The new Multi-Package Vending Machine uses energy differently than the traditional single package can/bottle vendor.

The proposed energy formula standard was developed for single package stacked-column beverage vendors, which dominate the marketplace. These traditional solid door beverage vendors have stacked columns of cans or bottles lying on their long side and cool densely packed containers in a cool-zone. But these older vending machines have problems dispensing the new package volumes and shapes that the consumer prefers. A new generation of vending machines – Multi-Package Vending Machines - commercialized after this energy standard was developed, reliably dispense those new preferred packages in large variety. Although they use more energy than traditional machines, Multi-Package Vendors are more energy efficient. So, the Appliance Efficiency Regulations should include a different energy threshold for Multi-Package Vendors, such as the Glass Front Vendor, that have only recently appeared in the marketplace.

The Coca-Cola Company supports the work of the National Automatic Merchandiser Association (NAMA) Energy Committee which is developing an energy usage standard for the new Multi-Package Beverage Vendor.

A Multi-package Vendor can have heavy wall insulation, the most energy efficient motors available, and innovative refrigerant expansion valves, and consequently a much better coefficient of energy performance than a traditional single product stacked-column vendor. Yet not achieve the energy requirement currently proposed. The Multi-package Vendor has shelved product so the product contact and amount of product are both less than that of a traditional stacked column vendor. The space occupied by the product delivery mechanism also must be refrigerated in a Multi-package Vendor. This portion of the cabinet does not have stored product. So more energy will be used for a Multi-package Vendor.

Please allow for an additional Beverage Vending Machine category to be added to the Appliance Efficiency Regulations – for Multi-Package Vendors.

Thank you.

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